

BRADFORD R. JERBIC  
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JANE DOE, an Individual,  
Plaintiff,

vs.

CITY OF LAS VEGAS, CITY OF  
HENDERSON, NATHAN HANNIG, an  
Individual, MARIO RUEDA, an Individual,  
RUBEN SANCHEZ, an Individual, JAMES  
SUAREZ, an Individual, JONATHAN  
CUFF, an Individual, JOSEPH "JOE"  
VANEK, an Individual, JAROD BARTO, an  
Individual, CODY RACINE, an Individual,  
JASON TULLIS, an Individual, and ZACH  
YEOMAN, an Individual, WILLIAM  
MCDONALD, an Individual, and as an  
Individual, JON STEVENSON, an  
Individual, JOHN DOE #1, likely an  
Individual, DOES I-X; ROE  
CORPORATIONS I-X,  
Defendant.

CASE NO. 2:19-cv-0382-GMN-PAL

**STIPULATION AND ORDER TO CONTINUE**  
**EARLY NEUTRAL EVALUATION SESSION**

**(FIRST REQUEST)**

Plaintiff JANE DOE, Defendant CITY OF LAS VEGAS (hereinafter referred to as  
“City”), and Defendant CITY OF HENDERSON are in receipt of the Court’s Order Scheduling  
Early Neutral Evaluation Session (“ENE”) [Dkt. No. 14] and hereby stipulate and respectfully  
request that the Court continue the date of the Early Neutral Evaluation Session which is

1 currently scheduled on Tuesday, April 23, 2019, at 9:00 a.m., for a period of approximately sixty  
2 (60) days. Plaintiff and the City of Las Vegas have entered into a Stipulation and Order for  
3 Extension of Time (First Request) in order to continue the City's deadline to Answer or  
4 otherwise respond to Plaintiff's Complaint and to oppose or otherwise respond to Plaintiff's  
5 Motion for Leave to Proceed Anonymously as follows: by forty-five (45) days from **March 25,**  
6 **2019 to May 9, 2019** for Defendant to respond to Plaintiff's Motion to Leave to Proceed  
7 Anonymously ("Motion") [Dkt. No. 8]; and forty-five (45) days from **March 28, 2019 to May**  
8 **13, 2019** for Defendant to respond to Plaintiff's Complaint and Jury Demand ("Complaint")  
9 [Dkt. No. 1]. This Stipulation was filed with the Court [Dkt. 11] on March 27, 2019, but has yet  
10 to be approved by the Court.

11 The parties believe that the ENE is premature since Plaintiff is continuing to serve the  
12 individual defendants, and at this juncture the City has not determined which, if any, of the  
13 named City employees will be provided a defense or legal counsel. Accordingly, while the City  
14 does not represent any of the employees at this juncture, the intent of this stipulation would be to

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1 apply the same extension to those individuals. This first extension request is not being sought to  
2 unduly delay the proceedings; rather, for the good cause discussed above.

3 DATED this 8th day of April 2019.

DATED this 8th day of April 2019.

4 HKM EMPLOYMENT ATTORNEYS LLP

BRADFORD R. JERBIC  
City Attorney

5 By: /s/ Jenny Foley  
6 JENNY L. FOLEY, PH.D., ESQ.  
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9 Las Vegas, NV 89104  
Attorneys for Plaintiff

By: /s/ Jack Eslinger  
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*Attorneys for Defendant  
City of Las Vegas*

10 DATED this 8th day of April 2019.

11 CITY OF HENDERSON

12 By: /s/ Brian Reeve  
13 BRIAN R. REEVE  
14 Assistant City Attorney  
15 Nevada Bar No. 10197  
16 240 Water Street, MSC 144  
17 Henderson, NV 89015  
*Attorneys for Defendant  
City of Henderson*

18 IT IS SO ORDERED.

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21 UNITED STATES MAGISTRATE JUDGE

22 April 9, 2019

23 DATE